

Exhibit 31



CT Money Transmission License Amendment Checklist (Company)

CHECKLIST SECTIONS

- [General Information](#)
- [Amendments](#)

GENERAL INFORMATION

Instructions

When making changes to your record in NMLS, the Connecticut Department of Banking requires advance notification for some changes. See the checklist below for details.

Uploading Agency-Specific Documents

If you are required to upload documents to NMLS for an Advance Change Notice (ACN), select “Advance Change Notice” for the document type in the NMLS Document Uploads section. If you are required to upload documents for an amendment that does not require ACN, select the applicable document type in the NMLS Document Uploads section.

Note: Use the recommended filing naming convention found on the [Document Upload Descriptions and Examples](#).

Helpful Resources

- [Amendments & Advance Change Notice](#)
- [Document Uploads Quick Guide](#)
- [Document Upload Descriptions and Examples](#)

Agency Contact Information

Contact Consumer Credit staff by phone at (860) 240-8225 or send your questions via email to dob.ccl@ct.gov for additional assistance.

*Connecticut Department of Banking
Consumer Credit Division
260 Constitution Plaza
Hartford, CT 06103-1800*

THE APPLICANT/LICENSEE IS FULLY RESPONSIBLE FOR ALL OF THE REQUIREMENTS OF THE LICENSE FOR WHICH THEY ARE APPLYING. THE AGENCY SPECIFIC REQUIREMENTS CONTAINED HEREIN ARE FOR GUIDANCE ONLY TO FACILITATE APPLICATION THROUGH NMLS. SHOULD YOU HAVE QUESTIONS, PLEASE CONSULT LEGAL COUNSEL.

AMENDMENTS

- [Change of Legal Name](#)
- [Change of Main Address](#)
- [Addition or Modification of Other Trade Name](#)
- [Deletion of Other Trade Name](#)
- [Change of Legal Status](#)
- [Addition or Modification of Affiliates/Subsidiaries](#)
- [Addition or Modification of Direct Owners/Executive Officers](#)
- [Addition or Modification of Indirect Owners](#)
- [Addition or Modification of Qualifying Individuals](#)
- [Change of Disclosure Question\(s\)](#)

Note: Information uploaded or filed in NMLS will not be viewable to the agency until the filing has been attested to and submitted through NMLS. Agency-specific requirements that should be emailed or mailed to the agency on the checklist below must be received with the appropriate checklist within five (5) business days of the electronic submission of your filing through NMLS.

NMLS ID Number	
Licensee Legal Name	

Complete	CT Money Transmission License Change of Legal Name Amendment Items	Submitted via...
<input type="checkbox"/>	Change of Legal Name: Submit an ACN for a change of Legal Name through the Company Form (MU1) in NMLS. 30 days' notice must be provided for this change.	NMLS
Note	Change of Legal Name Fee: \$0 per license Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.	N/A
<input type="checkbox"/>	Surety Bond Rider: Upload and mail an original company surety bond rider (or new bond if applicable) that reflects the entity's new legal name. The name of the principal insured on the bond must match exactly the full legal name of applicant, including any Other Trade Names. If a new surety bond is needed, use the Surety Bond Form found here .	Upload in NMLS: under the Document Type <u>Surety Bond</u> in the <i>Document Uploads</i> section of the Company Form (MU1). AND Mail to Connecticut Department of Banking
<input type="checkbox"/>	Formation Documents: Formation Documents must be submitted related to this change type. Determine classification of applicant's legal status and submit a State certified copy of the requested applicable documentation detailed below. Original formation documents and all subsequent amendments, thereto including a list of any name changes. General Partnership: <ul style="list-style-type: none"> Partnership Agreement (including all amendments). Limited Liability Company: <ul style="list-style-type: none"> Articles of Organization (including all amendments); Corporation: <ul style="list-style-type: none"> Articles of Incorporation (including all amendments) 	Upload in NMLS: under the Document Type <u>Formation Document</u> in the <i>Document Uploads</i> section of the Company Form (MU1).

Complete	CT Money Transmission License Change of Main Address Amendment Items	Submitted via...
<input type="checkbox"/>	Change of Main Address: Submit an ACN for a change of Main (Corporate) Address through the Company Form (MU1) in NMLS. 30 days' notice must be provided for this change.	NMLS
Note	Change of Main Address: \$0 per license Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.	N/A
<input type="checkbox"/>	Surety Bond Rider: Upload and mail an original company surety bond rider (or new bond if applicable) that reflects the entity's new main address. The name address of the principal insured on the bond must match exactly. If a new surety bond is needed, use the Surety Bond Form found here .	Upload in NMLS: under the Document Type <u>Surety Bond</u> in the <i>Document Uploads</i> section of the Company Form (MU1). AND Mail to Connecticut Department of Banking

Complete	CT Money Transmission License Addition or Modification of Other Trade Name Amendment Items	Submitted via...
<input type="checkbox"/>	Addition or Modification of Other Trade Name: Submit an ACN for an addition of or change to an Other Trade Name through the Company Form (MU1) in NMLS. 30 days' notice must be provided for this change.	NMLS
Note	Addition of Other Trade Name \$0 per license. Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.	N/A
<input type="checkbox"/>	Surety Bond Rider: Upload and mail an original company surety bond rider (or new bond if applicable) that reflects the addition of or change to an Other Trade Name. The name of the principal insured on the bond must match exactly the full legal name of applicant, including all Other Trade Names. If a new surety bond is needed, use the Surety Bond Form found here .	Upload in NMLS: under the Document Type <u>Surety Bond</u> in the <i>Document Uploads</i> section of the Company Form (MU1). AND Mail to Connecticut Department of Banking

Complete	CT Money Transmission License Deletion of Other Trade Name Amendment Items	Submitted via...
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Complete	CT Money Transmission License Deletion of Other Trade Name Amendment Items	Submitted via...
<input type="checkbox"/>	<p>Deletion of Other Trade Name: Submit an ACN for a deletion an Other Trade Name through the Company Form (MU1) in NMLS. 30 days' notice must be provided for this change.</p> <p>If deleting an Other Trade Name, this name must be removed from the <i>Other Trade Names</i> section of the Company Form (MU1).</p>	NMLS
<input type="checkbox"/>	<p>Surety Bond Rider: Upload and mail an original company surety bond rider (or new bond if applicable) that reflects the deletion of an Other Trade Name. The name of the principal insured on the bond must match exactly the full legal name of applicant, including all active Other Trade Names.</p> <p>If a new surety bond is needed, use the Surety Bond Form found here.</p>	<p>Upload in NMLS: under the Document Type <u>Surety Bond</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p> <p>AND</p> <p>Mail to Connecticut Department of Banking</p>

Complete	CT Money Transmission License Change of Legal Status Amendment Items	Submitted via...
<p>Note: In many cases, a change to the Fiscal Year End, Legal Status, and State or Date of Formation indicates a new entity has been formed and a new NMLS record is required. This includes the creation of a new NMLS account and submission of a new Company Form (MU1).</p>		
<input type="checkbox"/>	<p>Change of Legal Status: Submit an amendment for a change in Legal Status within the Company Form (MU1) in NMLS. Must be filed on the NMLS no later than 15 days after the licensee had reason to know of the change.</p>	NMLS

Complete	CT Money Transmission License Addition or Modification of Affiliates/Subsidiaries Amendment Items	Submitted via...
<input type="checkbox"/>	<p>Addition or Modification of Affiliates/Subsidiaries: Submit an amendment for an addition or change in Affiliates/Subsidiaries within the Company Form (MU1) in NMLS. Must be filed on the NMLS no later than 15 days after the licensee had reason to know of the change.</p>	NMLS

Complete	CT Money Transmission License Addition or Modification of Qualifying Individual Amendment Items	Submitted via...
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Complete	CT Money Transmission License Addition or Modification of Qualifying Individual Amendment Items	Submitted via...
<input type="checkbox"/>	Addition or Modification of Qualifying Individual: Submit an amendment for an addition or change of the Qualifying Individual within the Company Form (MU1) in NMLS. Must be filed on the NMLS no later than 15 days after the licensee had reason to know of the change.	NMLS
<input type="checkbox"/>	Credit Report for Qualifying Individual: \$15 per person.	NMLS (Filing submission)
<input type="checkbox"/>	Credit Report: Qualifying Individuals are required to authorize a credit report through NMLS. Individuals will be required to complete an Identity Verification Process (IDV) along with an individual attestation before a license request for your company can be filed through NMLS.	NMLS
<input type="checkbox"/>	FBI Criminal Background Check for Qualifying Individual: \$36.25 per person.	NMLS (Filing submission)
<input type="checkbox"/>	<p>Qualifying Individual FBI Criminal Background Check Requirements: Qualifying Individuals are required to authorize an FBI criminal background check (CBC) through NMLS.</p> <p>After authorizing a FBI criminal background check through the submission of the Company Form (MU1) and Individual Form (MU2), you must schedule an appointment to be fingerprinted if new prints are required.</p> <p>See the Criminal Background Check section of the NMLS Resource Center for more information.</p> <p>Note: If you are able to 'Use Existing Prints' to process the FBI criminal background check, you DO NOT have to schedule an appointment. NMLS will automatically submit the fingerprints on file.</p>	NMLS

Complete	CT Money Transmission Addition or Modification of Direct Owners/Executive Officers and Control Persons Amendment Items	Submitted via...
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Complete	CT Money Transmission Addition or Modification of Direct Owners/Executive Officers and Control Persons Amendment Items	Submitted via...
<p>Note: License shall not be transferable or assignable. Changes to control persons defined here shall be subject to 30 days' advance notice and no such change shall occur without the Commissioner's approval.</p> <p>Control Person means, "an individual that directly or indirectly exercises control over another person. Any person that (A) is a director, general partner or executive officer; (B) in the case of a corporation, directly or indirectly has the right to vote ten per cent or more of a class of any voting security or has the power to sell or direct the sale of ten per cent or more of any class of voting securities; (C) in the case of a limited liability company, is a managing member; or (D) in the case of a partnership, has the right to receive upon dissolution, or has contributed, ten per cent or more of the capital, is presumed to be a control person. For purposes of this subdivision, "control" means the power, directly or indirectly, to direct the management or policies of a company, whether through ownership of securities, by contract or otherwise."</p>		
<input type="checkbox"/>	<p>Addition or Modification of Direct Owners/Executive Officers: Submit an ACN for an addition or change in a control person as a result of an acquisition or a change of control of the licensee within the Company Form (MU1) in NMLS. 30 days' notice must be provided for this change.</p> <p>AND/OR</p> <p>Submit an amendment for an addition or change in Direct Owners/Executive Officers that is not the result of an acquisition or change of control of the license within the Company Form (MU1) in the NMLS. Must be filed on the NMLS no later than 15 days after the licensee had reason to know of the change.</p>	<p>NMLS</p>
<input type="checkbox"/>	<p>Credit Report for MU2 Individual: \$15 per person.</p>	<p>NMLS (Filing submission)</p>
<input type="checkbox"/>	<p>Credit Report: Direct Owners/Executive Officers are required to authorize a credit report through NMLS. Individuals will be required to complete an Identity Verification Process (IDV) along with an individual attestation before a license request for your company can be filed through NMLS.</p>	<p>NMLS</p>
<input type="checkbox"/>	<p>FBI Criminal Background Check for MU2 Individual: \$36.25 per person.</p>	<p>NMLS (Filing submission)</p>
<input type="checkbox"/>	<p>MU2 Individual FBI Criminal Background Check Requirements: When added to the Company Form (MU1), the following Individuals, as specified below, are required to authorize a FBI criminal background check (CBC) through NMLS:</p> <p><i>Direct Owners/Executive Officers</i></p> <p>After authorizing a FBI criminal background check through the submission of the Company Form (MU1) and Individual Form (MU2), you must schedule an appointment to be fingerprinted if new prints are required.</p> <p>See the Criminal Background Check section of the NMLS Resource Center for more information.</p>	<p>NMLS</p>

Complete	CT Money Transmission Addition or Modification of Direct Owners/Executive Officers and Control Persons Amendment Items	Submitted via...
	Note: If you are able to 'Use Existing Prints' to process the FBI criminal background check, you DO NOT have to schedule an appointment. NMLS will automatically submit the fingerprints on file.	
<input type="checkbox"/>	Management Chart: Submit an updated Management Chart displaying the applicant's directors, officers, and managers (individual name and title). Must also identify compliance reporting and internal audit structure. If the existing uploaded Management Chart already includes the above information, an additional document does not need to be uploaded. A company should only upload a single Management Chart. This document should be named <i>[Company Legal Name] Management Chart</i> .	Upload in NMLS: under the Document Type <u>Management Chart</u> in the <i>Document Uploads</i> section of the Company Form (MU1).

Complete	CT Money Transmission License Addition or Modification of Indirect Owners Amendment Items	Submitted via...
Note: License shall not be transferable or assignable. Changes to control persons defined here shall be subject to 30 days' advance notice and no such change shall occur without the Commissioner's approval. Control Person means, "an individual that directly or indirectly exercises control over another person. Any person that (A) is a director, general partner or executive officer; (B) in the case of a corporation, directly or indirectly has the right to vote ten per cent or more of a class of any voting security or has the power to sell or direct the sale of ten per cent or more of any class of voting securities; (C) in the case of a limited liability company, is a managing member; or (D) in the case of a partnership, has the right to receive upon dissolution, or has contributed, ten per cent or more of the capital, is presumed to be a control person. For purposes of this subdivision, "control" means the power, directly or indirectly, to direct the management or policies of a company, whether through ownership of securities, by contract or otherwise."		
<input type="checkbox"/>	Addition or Modification of Indirect Owners: Submit an ACN for an addition or change in a control person as a result of an acquisition or a change of control of the licensee within the Company Form (MU1) in NMLS. 30 days' notice must be provided for this change. AND/OR Submit an amendment for an addition or change in Indirect Owners that is not the result of an acquisition or change of control of the license within the Company Form (MU1) in the NMLS. Must be filed on the NMLS no later than 15 days after the licensee had reason to know of the change.	NMLS

Complete	CT Money Transmission License Change of Disclosure Question(s) Amendment Items	Submitted via...
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Complete	CT Money Transmission License Change of Disclosure Question(s) Amendment Items	Submitted via...
<input type="checkbox"/>	Change of Disclosure Question(s): Submit an amendment for a change to Disclosure Question response(s) through the Company Form (MU1) in NMLS. Must be filed on the NMLS no later than 15 days after the licensee had reason to know of the change.	NMLS
<input type="checkbox"/>	Changing a Response from No to Yes: Provide a complete and detailed explanation and document upload for each response that changes from “No” to “Yes” for company or each control person. See the Company Disclosure Explanations Quick Guide for instructions.	Upload in NMLS in the <i>Disclosure Explanations</i> section of the Company Form (MU1) or Individual Form (MU2).
<input type="checkbox"/>	Changing a Response from Yes to No: When changing a Disclosure Question response from “Yes” to “No”, you will be required to remove the question from the associated Disclosure Explanation and provide an Amendment Reason. You must select “Add Explanation for “No” Responses” and provide an explanation for each response that changes from “Yes” to “No” for company or each control person. You may also upload a document (PDF) related to the explanation. See the Company Disclosure Explanations Quick Guide for instructions.	NMLS

Complete	CT Money Transmission License Events Requiring Notice Within One Day	Submitted via...
<input type="checkbox"/>	<p>Events Requiring Notice: A licensee must submit an amendment for a change in Disclosure Question response(s) through the Company Form (MU1) in NMLS, or, if the information cannot be filed on the system, provide a written notice no later than one business day after the licensee has reason to know of the occurrence of any of the following events:</p> <ul style="list-style-type: none"> • The filing of a petition by or against the licensee under the United States Bankruptcy Code for bankruptcy or reorganization or the filing of a petition under the United States Bankruptcy Code for bankruptcy or reorganization by any control person, qualified individual or authorized delegate of the licensee; • The filing of a petition by or against the licensee for receivership, the commencement of any other judicial or administrative proceeding for its dissolution or reorganization, or the making of a general assignment for the benefit of its creditors; • The commencement of a proceeding to revoke or suspend its license to engage in money transmission in another state or a foreign country, or other formal or informal regulatory action by any governmental agency against the licensee or any control person, qualified individual or authorized delegate of the licensee and the reasons therefor; 	<p>NMLS AND/OR Mail/Email to Connecticut Department of Banking</p>

Complete	CT Money Transmission License Events Requiring Notice Within One Day	Submitted via...
	<ul style="list-style-type: none"> • The commencement of any action by the Attorney General or the attorney general of any other state against the licensee or any control person, qualified individual or authorized delegate of the licensee and the reasons therefor; • The cancellation or other impairment of the licensee's bond or other security, including notice of claims filed against the licensee's bond or other security; • A conviction or indictment of the licensee or of [a partner, director, trustee, principal officer, member or shareholder owning ten per cent or more of each class of the licensee's securities] any control person or qualified individual of the licensee for a misdemeanor involving the money transmission business or a felony; or • A conviction or indictment of an authorized delegate for a misdemeanor involving the money transmission business or a felony. 	